

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 05-39-GMS
	:	
	:	
JEFFREY BENTLEY,	:	
	:	
Defendant.	:	

**MOTION FOR CONTINUANCE OF SENTENCING**

Defendant, Jeffrey Bentley, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court for an order continuing the sentencing hearing in this case. In support of the motion, the defense submits as follows:

1. Mr. Bentley is currently scheduled for sentencing on May 25, 2006 at 11:00 a.m.
2. Defense counsel requires additional time to prepare for sentencing and additional time to review the presentence report with Mr. Bentley to determine what, if any, objections to the presentence report the defense wishes to make.
3. Defense counsel respectfully requests that Mr. Bentley's sentencing be continued to allow defense counsel time to adequately prepare for sentencing in light of some of the information contained in the presentence report.
4. AUSA Edmund Falgowski and USPO Margaret Bray do not oppose this request for a continuance.

5. Defense counsel will be out of the office from May 30, 2006 through June 2, 2006, and also from June 21, 2006 through June 27, 2006. It is respectfully requested that sentencing be continued until anytime after June 28, 2006.

6. After speaking with the Court's chambers, defense counsel was informed that the Court is available to hold the sentencing hearing on June 29, 2006 at 9:30 a.m.

7. Any objections to the presentence report will be filed by the defendant no later than June 20, 2006.

WHEREFORE, Mr. Bentley respectfully requests that the Court continue the sentencing hearing in this matter to June 29, 2006 at 9:30 a.m.

Respectfully Submitted,

/s/  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Jeffrey Bentley

DATED: May 18, 2006

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FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
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Plaintiff,	:	
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v.	:	Criminal Action No. 05-39-GMS
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JEFFREY BENTLEY,	:	
	:	
Defendant.	:	

**CERTIFICATE OF SERVICE**

The undersigned attorney for defendant Jeffrey Bentley hereby certifies that a copy of Defendant's Motion for Continuance of Sentencing is available for public viewing and downloading and was electronically delivered on May 18, 2006, to:

Edmund Falgowski, Esquire  
Assistant U.S. Attorney  
1007 Orange Street  
Suite 700, P.O. Box 2046  
Wilmington, DE 19899-2046

The undersigned attorney further certifies that on May 18, 2006, a copy of the attached Motion for Continuance of Sentencing was placed in a box in the United States District Court of the District of Delaware addressed to the following person:

Margaret Bray  
U. S. Probation Officer  
Suite 400, 824 Market Street  
Wilmington, DE 19801-3588

/s/ \_\_\_\_\_  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Jeffrey Bentley